



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Certified Mail #: 7005 3110 0002 8246 8896
RETURN RECEIPT REQUESTED

APR 25 2006

M.R. McAllister, President
Los Angeles By-Products Company
4050 Katella Ave., Suite 209
Los Alamitos, CA 90720

Re: General Notice Letter/104(e) for the San Fernando Valley/North Hollywood
Superfund Site
North Hollywood, California

Dear Mr. McAllister:

Under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency ("EPA") is responsible for responding to the release or threat of release of hazardous substances and pollutants or contaminants into the environment—that is, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. EPA has documented that hazardous substances and pollutants or contaminants were released at the San Fernando Valley Area 1 site, North Hollywood Operable Unit ("NHOU" or "the Site"), located in Los Angeles County, California. EPA has spent public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Site. As you know, EPA previously determined that the Los Angeles By-Products Company (the "Company") may be responsible under Superfund for cleanup of the Site or costs EPA has incurred in cleaning up the Site.

Explanation of Potential Liability

Under CERCLA, specifically Sections 106(a) and 107(a), potentially responsible parties ("PRPs") may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be responsible for costs incurred by EPA in cleaning up the Site. PRPs include current owners or operators of a site, former owners or operators during disposal, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the site and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

Based on the information collected, EPA believes that the Company may be liable for contamination of soils and groundwater at the Site under Section 107(a) of CERCLA. Liability is based on the Company's status as an owner of a facility and as an operator of multiple facilities within the Site from which contaminants, including but not limited to trichloroethylene ("TCE") and tetrachloroethylene ("PCE"), were released into the environment.

To date, EPA has taken several response actions at the Site under the authority of CERCLA. In 1989, EPA issued an Interim Record of Decision ("ROD") in which EPA selected an interim remedy for the Site. The interim remedy, which was expected to last fifteen years, required the extraction and treatment of PCE and TCE from groundwater and delivery of the treated groundwater to the City of Los Angeles's public drinking water system. Since 1989, EPA has funded the operation and maintenance ("O&M") of the interim remedy. Initially, EPA funded the O&M using Superfund money. Subsequently, EPA entered into two consent decrees with PRPs at the Site, including one to which the Company was a signatory. EPA has used the funds recovered in those settlements to fund the O&M of the interim remedy. At this time, the EPA is considering selecting further remedial actions at the Site.

EPA will incur further costs to evaluate, select, and implement further response actions at the Site. This general notice letter provides you with advance notice that EPA may seek to recover its costs from the Company for such response actions, and/or may ask the Company to perform work at the Site.

Financial Concerns/Ability to Pay Settlements

EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at the Site may be substantially limited. If you believe, and can document, that you fall within that category, please contact Kim Muratore of EPA at 75 Hawthorne Street, San Francisco, CA, 94105, (415) 972-3121, muratore.kim@epa.gov, for information on "Ability-to-Pay Settlements." If you make a limited-ability-to-pay claim, you will receive a letter requesting certain financial information such as tax returns, financial statements, etc., that EPA will use to conduct its analysis. If EPA concludes that the Company has a legitimate inability to pay the full amount of EPA's costs, EPA may offer a schedule for payment over time or a reduction in the total amount demanded from the Company.

Also, please note that because EPA has a potential claim against the Company, it must include EPA as a creditor if it files for bankruptcy.

Information to Assist You

EPA would like to encourage communication between the Company, other PRPs, and EPA. EPA typically recommends that all PRPs meet to select a "steering committee" that will be responsible for representing the group's interests. Establishing a manageable group is critical to successful negotiations with EPA. If this is not possible, EPA encourages each PRP to select one person from its company or organization to represent its interests to EPA. To assist you in your

efforts to communicate, we have enclosed a list of names and addresses of PRPs to whom this letter, or a very similar letter, is being sent. (Enclosure A)

EPA will establish an Administrative Record that contains documents that serve as the basis for EPA's selection of further cleanup actions for the Site. The Administrative Record for the 1989 ROD is located at the Los Angeles Department of Water and Power Library, 111 North Hope Street, Room 516, Los Angeles, CA, phone (213) 367-1995, and is available to the Company and the public for inspection. The Administrative Record is also available for inspection at the Superfund Records Center, EPA Region 9, 95 Hawthorne Street, 4th floor, San Francisco, CA 94105. As EPA moves forward with selection of further response actions for the Site, EPA will supplement the Administrative Record. EPA also may issue advance notice of the proposed action(s) for public comment.

Resources and Information for Small Businesses

As you may be aware, on January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, that we suggest all parties evaluate. You may obtain a copy of the law via the Internet at <http://www.epa.gov/swerosps/bf/sblrbra.htm> and review EPA guidances regarding these exemptions at <http://www.epa.gov/compliance/resources/policies/cleanup/superfund>.

In addition, if you are a "service station dealer" who accepts used oil for recycling, you may qualify for an exemption from liability under Section 114(e) of CERCLA. EPA guidance regarding this exemption can be found on the Internet at <http://www.epa.gov/compliance/resources/policies/cleanup/superfund>. If you believe you may qualify for the exemption, please contact Assistant Regional Counsel Michael Massey at 75 Hawthorne Street, San Francisco, CA, 94105, 415-972-3034, or e-mail him at Massey.Michael@epa.gov, to request an application/information request specifically designed for service station dealers.

EPA has created a number of helpful resources for small business. EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at www.epa.gov. In addition, the EPA Small Business Ombudsman may be contacted at www.epa.gov/sbo. Finally, EPA developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act ("SBREFA"), which is enclosed with this letter. (Enclosure B)

CERCLA 104(e) Information Request

EPA believes that the Company may have information which could assist the California Regional Water Quality Control Board ("RWQCB") and EPA in their investigation of the groundwater at the Site, especially with regard to TCE, PCE, and chromium, and requests that the Company answer the questions contained in Enclosure D. Definitions and instructions on how to respond to the questions are provided in Enclosure C.

Under Section 104(e) of CERCLA, 42 U.S.C. §9604(e), EPA has broad information gathering authority which allows EPA to require persons to furnish information or documents relating to:

(A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.

(B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.

(C) Information relating to the ability of a person to pay for or perform a cleanup.

Please note that the Company's compliance with this information request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5). This statutory provision authorizes EPA to seek the imposition of penalties of up to \$32,500 per day of noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001. The information the Company provides may be used by EPA in administrative, civil, or criminal proceedings.

Some of the information EPA is requesting may be considered by the Company to be confidential. Please be aware that the Company may not withhold information upon that basis. If the Company wishes EPA to treat the information confidentially, it must advise EPA of that fact by following the procedures outlined in Enclosure C, including the requirement for supporting its claim for confidentiality.

This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See also, 5 C.F.R. §§1320.3(c), 1320.4, and 1320.6(a).

We encourage the Company to give this matter its immediate attention and request that it provide a complete and truthful response to this information request within thirty (30) calendar days of its receipt of this letter. EPA is committed to moving forward with its investigation, and extensions of time for responses will only be granted upon a showing of good cause. If the Company anticipates that it will need an extension, please request one as soon as possible. Requests for extensions made at or near the due date will not be viewed favorably by EPA. The Company's response to this letter should be made in writing and signed by you or a duly authorized representative of the Company. If some or all of the requested information has previously been provided to EPA, the Company may incorporate that information by referencing the date of the earlier response and the information contained therein that is responsive to the current information request.

The Company's response should include the appropriate name, address, and telephone number of the person to whom EPA should direct future correspondence in regard to this information

request. The Company's response to the information request should be directed to:

Kim Muratore, Case Developer (SFD-7-B)
U.S. EPA, Region 9
75 Hawthorne St.
San Francisco, CA 94105

Please also provide the appropriate name, address, and telephone number of the person to whom EPA should direct future correspondence with regard to the general notice portion of this letter. If you have any questions regarding this letter or the Site's cleanup status, please contact the Remedial Project Manager, Rachel Loftin at (415) 972-3253, loftin.rachel@epa.gov. Questions regarding settlement or legal matters can be directed to Michael Massey at 415-972-3034 or e-mail at Massey.Michael@epa.gov. Thank you for your prompt attention to this matter.

Sincerely,


A handwritten signature in black ink, appearing to read "Elizabeth Adams", with a stylized flourish at the end.

Elizabeth Adams, Chief
Site Cleanup Branch
Superfund Division

Enclosures (4)

cc: Raoul Montes
Greenwald, Hoffman & Meyer
500 N. Brand Blvd., Suite 920
Glendale, CA 91203

ENCLOSURE A: LIST OF PARTIES RECEIVING SIMILAR LETTERS

1. Keith P. Ryan, President and CEO
Aircraft Service International, Inc.
201 S. Orange Ave.
Suite 1100
Orlando, FL 32801
(407) 648-7373
2. Jerry Conrow & William Cooke, Co-Trustees
Amended Cooke Family Trust
c/o Jerry L. Conrow & Company
23871 Madison St.
Torrance, CA 90505-6008
(310) 378-8318
3. Mr. Milton I. Berman, Trustee
Berman Family Trust
210 S. Victory Blvd.
Burbank, CA 91502
(310) 276-4820
4. Nathan B. Adlen, President
California Car Hikers Service
11590 Tuxford Street
Sun Valley, CA 91352
5. R. McAbee, President
CalMat Co.
3200 San Fernando Rd.
Los Angeles, CA 90065
(323) 258-2777
6. Lars E. Bruun-Andersen
for Erik & Else Bruun-Andersen Trust
Personal Privacy

7. Richard A. Fortner, President
Hawker Pacific Aerospace
11240 Sherman Way
Sun Valley, CA 91352
(818) 765-6201

8. Thomas C. Hutton, Owner
Hayward Associates

Personal Privacy

9. Glenn C. McElroy, Owner
Hayward Associates

Personal Privacy

10. Phillip B. McElroy, Owner
Hayward Associates

Personal Privacy

11. Jeffrey P. Neu, Owner
Hayward Associates
Berth 210-211
901 New Dock Street
Terminal Island, CA 90731

12. John L. Neu, Owner
Hayward Associates
c/o Hugo Neu Corporation
110 5th Ave., Suite 700
New York, NY 10011-5614

13. Robert T. Neu, Owner
Hayward Associates

Personal Privacy

14. Robert L. Nardelli, CEO
Home Depot U.S.A., Inc.
2455 Paces Ferry Rd. SE
Atlanta, GA 30339-4024
(770) 433-8211

15. David M. Cote, President
Honeywell International Inc.
101 Columbia Rd.
Morristown, NJ 07962
(973) 455-2000

16. Ms. Viola M. Basinger, Trustee

JW & VM Basinger Trust PT
c/o Don Basinger

Personal Privacy

17. Robert J. Stevens, President and CEO
Lockheed Martin Corporation
6801 Rockledge Dr.
Bethesda, MD 20817-1877
(301) 897-6000

18. Erik B. Andersen, President
Pacific Magnetic & Penetrant Co., Inc.
6837 Farmdale Avenue
North Hollywood, CA 91605
(818) 765-7266

19. Erik Bruun-Andersen, Member/Manager
Pacwest Properties, LLC
6837 Farmdale Avenue
North Hollywood, CA 91605

20. Glenn C. McElroy, President
Pick-Your-Part Auto Wrecking
1301 E. Orangewood Ave.
Anaheim, CA 92805
(714) 385-1301

21. Linda Wagner Lipscomb, Trustee
Wagner Trust

Personal Privacy

22. Duane C. Woods, President
Waste Management Recycling and Disposal Services of California, Inc.
d/b/a Bradley Landfill and Recycling Center
1001 Fannin Street, Suite 4000
Houston, TX 77002
(713) 512-6200



Office of Enforcement and Compliance Assurance
INFORMATION SHEET

U.S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and State environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. Many public libraries provide access to the Internet at minimal or no cost.

EPA's Small Business Home Page (<http://www.epa.gov/sbo>) is a good place to start because it links with many other related websites. Other useful websites include:

EPA's Home Page
<http://www.epa.gov>

Small Business Assistance Programs
<http://www.epa.gov/ttn/sbap>

Compliance Assistance Home Page
<http://www.epa.gov/oeca/oc>

Office of Site Remediation Enforcement
<http://www.epa.gov/oeca/osre>

Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance on environmental requirements.

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs. Key hotlines include:

EPA's Small Business Ombudsman
(800) 368-5888

*Hazardous Waste/Underground Tanks/
Superfund*
(800) 424-9346

National Response Center
(to report oil and hazardous substance spills)
(800) 424-8802

Toxics Substances and Asbestos Information
(202) 554-1404

Safe Drinking Water
(800) 426-4791

*Stratospheric Ozone and Refrigerants
Information*
(800) 296-1996

Clean Air Technical Center
(919) 541-0800

Wetlands Hotline
(800) 832-7828

Continued on back



Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established national Compliance Assistance Centers that provide Internet and "faxback" assistance services for several industries with many small businesses. The following Compliance Assistance Centers can be accessed by calling the phone numbers below and at their respective websites:

Metal Finishing

(1-800-AT-NMFRC or www.nmfrc.org)

Printing

(1-888-USPNEAC or www.pneac.org)

Automotive Service and Repair

(1-888-GRN-LINK or www.ccar-greenlink.org)

Agriculture

(1-888-663-2155 or www.epa.gov/oeca/ag)

Printed Wiring Board Manufacturing

(1-734-995-4911 or www.pwbrc.org)

The Chemical Industry

(1-800-672-6048 or www.chemalliance.org)

The Transportation Industry

(1-888-459-0656 or www.transource.org)

The Paints and Coatings Center

(1-800-286-6372 or www.paintcenter.org)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information. For assistance in reaching state agencies, call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-enviroweb.org/state.html>.

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses: The Audit Policy (<http://www.epa.gov/oeca/auditpol.html>) and the Small Business Policy (<http://www.epa.gov/oeca/>

[smbusi.html](http://www.epa.gov/oeca/smbusi.html)). These do not apply if an enforcement action has already been initiated.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your Standard Industrial Code (SIC) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.

ENCLOSURE C: INSTRUCTIONS AND DEFINITIONS

Instructions:

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this information request. For each question contained in this letter, if information responsive to this information request is not in the Company's possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. When answering the questions in Enclosure D, please precede each answer with the corresponding number of the question and subpart to which it responds.
3. Number Each Document. For each document produced in response to this information request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
4. Provide the Best Information Available. Provide responses to the best of the Company's ability, even if the information sought was never put down in writing or if the written documents are no longer available. The Company should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available will be considered non-compliance with this information request.
5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that the Company relied on in producing its answer.
6. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this information request become known or available to the Company after it responds to this information request, EPA hereby requests pursuant to CERCLA Section 104(e) that the Company supplement its response to EPA.
7. Scope of Request. The scope of this request includes all information and documents independently developed or obtained by research on the part of the Company, its attorneys and consultants or any of their agents, consultants, or employees.
8. Confidential Information. The information requested herein must be provided even though the Company may contend that it includes confidential information or trade secrets. The Company may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b). If the Company makes a claim of confidentiality for any of the information it submits to EPA, it must prove that claim. For each document or response the Company claims as confidential, it must separately address the following points:

- (a) Clearly identify the portions of the information alleged to be entitled to confidential treatment;
- (b) Identify the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
- (c) Identify measures taken by the Company to guard against the undesired disclosure of the information to others;
- (d) Explain the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
- (e) Provide pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
- (f) State whether the Company asserts that disclosure of the information would likely result in substantial harmful effects to the Company's competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.
- (g) To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. The Company should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit the Company's response so that all nonconfidential information, including any redacted versions of documents, are in one envelope and all materials for which the Company desires confidential treatment are in another envelope.
- (h) All confidentiality claims are subject to EPA verification. It is important that the Company satisfactorily show that it has taken reasonable measures to protect the confidentiality of the information and that it intends to continue to do so, and that the information is not and has not been obtainable by legitimate means without the Company's consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to the Company.

9. Disclosure to EPA's Authorized Representatives. Information that the Company submits in response to this information request may be disclosed by EPA to authorized representatives of the United States pursuant to 40.C.F.R. 2.310(h) even if the Company asserts that all or part of it is confidential business information. The authorized representatives of EPA to which EPA may disclose information contained in the Company's response are as follows:

Arctic Slope Regional Corp.
EPA Contract Number 68-R9-0101

Department of Toxic Substances Control/California
Environmental Protection Agency

Science Applications International Corporation
EPA Contract Number GS-10F-0076J

Any subsequent additions or changes in EPA contractors who may have access to the Company's response to this information request will be published in the Federal Register.

This information may be made available to these authorized representatives of EPA for any of the following reasons: to assist with document handling, inventory, and indexing; or to assist with document review and analysis for verification of completeness; or to provide expert technical review of the contents of the response. Pursuant to 40 C.F.R. §2.310(h), the Company may submit comments on EPA's potential disclosure of any confidential information to its authorized representatives within the thirty (30) calendar day period in which the response is due.

10. Objections to Questions. If the Company has objections to some or all of the questions contained in the information request, it is still required to respond to each of the questions.

Definitions Applicable to Appendix D, Information Request:

1. Any reference to Los Angeles By-Products Company, or the "Company" should be interpreted to include, but not be limited to, all officers, managers, employees, contractors, assigns, agents, trustees, predecessors, successors, subsidiaries, operating divisions, affiliates, and branches.
2. The term "person" shall include any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.
3. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge.
4. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA.
5. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.

6. The term “release” has the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
7. The term “pollutant or contaminant” shall have the same definition as that contained in Section 101(33) of CERCLA and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.
8. The term “materials” shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants.
9. The term “documents” includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

ENCLOSURE D: INFORMATION REQUEST

1. State the full legal name, address, telephone number, position(s) held by, and tenure of the individual(s) answering any of the questions below on behalf of the Los Angeles By-Products Company (the "Company").
2. Identify the individuals who are or were responsible for environmental matters at the Company's facility located at the former Penrose Landfill, identified variously with the street addresses of 8251 Tujunga Ave., Sun Valley, California ("8251 Tujunga"); 8271 Tujunga Ave., Sun Valley, California ("8271 Tujunga"); 8216 Tujunga Ave., Sun Valley, California ("8216 Tujunga"); 8301 Tujunga Ave., Sun Valley, California ("8301 Tujunga"); and 8175 Fair Ave., Sun Valley, California ("8175 Fair") (collectively, the "Penrose Facility"). Henceforth, the term "Penrose Facility" shall be interpreted to include the real property at 8251 Tujunga, 8271 Tujunga, 8216 Tujunga, 8301 Tujunga, and 8175 Fair, and any improvement thereto. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates each individual held such position.
3. Identify the individuals who are or were responsible for environmental matters at the Company's facility located at the former Hewitt Pit landfill at 7361 Laurel Canyon Blvd., North Hollywood, California (the "Hewitt Pit Facility"). Henceforth, the term "Hewitt Pit Facility" shall be interpreted to include the real property at 7361 Laurel Canyon Blvd., North Hollywood, California, and any improvement thereto. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates each individual held such position.
4. Identify the individuals who are or were responsible for environmental matters at the Company's facility located at the former Tuxford Landfill, the location of which has been variously identified as 11590 Tuxford Street, Sun Valley, California; 8501 Tujunga Ave., Sun Valley, California; 8520 Telfair Avenue, Sun Valley, California; and 11409 Penrose Street, Sun Valley, California (the "Tuxford Facility"). The Tuxford Facility is alternatively identified as encompassing Los Angeles County Assessor parcel numbers 2632-011-010, 2632-011-011, and 2632-011-012. Henceforth, the term "Tuxford Facility" shall be interpreted to include the real property associated with Los Angeles County Assessor parcel numbers 2632-011-010, 2632-011-011, and 2632-011-012, and any improvements thereto. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates each individual held such position.
5. Provide a detailed description of the nature of the Company's operations at the Penrose Facility, covering the entire period of time that the Company was operating at the Penrose Facility. Identify any changes to those operations over time. Provide the time frames for each type of operation undertaken at the Penrose Facility by the Company. Identify the types of wastes accepted at the Penrose Facility during the time that it was operated by the

Company as a landfill.

6. Provide a detailed description of the nature of the Company's operations at the Hewitt Pit Facility, covering the entire period of time that the Company was operating at the Hewitt Pit Facility. Identify any changes to those operations over time. Provide the time frames for each type of operation undertaken at the Hewitt Pit Facility by the Company. Identify the types of wastes accepted at the Hewitt Pit Facility during the time that it was operated by the Company as a landfill.
7. Provide a detailed description of the nature of the Company's operations at the Tuxford Facility, covering the entire period of time that the Company was operating at the Tuxford Facility. Identify any changes to those operations over time. Provide the time frames for each type of operation undertaken at the Tuxford Facility by the Company. Identify the types of wastes accepted at the Tuxford Facility during the time that it was operated by the Company as a landfill.
8. Explain the Company's present operational status (e.g., active, suspended, defunct, merged, or dissolved).
9. Provide the date the Company was incorporated, formed, or organized. Identify the State in which the Company was incorporated, formed, or organized.
10. Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates and identify all former business structures under which it existed or operated since 1925.
11. For each business structure under which the Company has existed or operated at the Penrose Facility, the Hewitt Pit Facility, or the Tuxford Facility (collectively, the "Facilities") since 1925, provide the corresponding dates that the Company existed or operated under that business structure, the name(s) it used, and each of the facility addresses at which it operated or was otherwise located.
12. Provide a copy of the articles of incorporation, partnership agreement, articles of organization, or any other documentation (together with any amendments) demonstrating the particular business structure under which the Company has existed or operated since 1925.
13. If the Company is or was operating under a fictitious business name, identify the fictitious name and the owner(s) of the fictitious name, and provide a copy of the Fictitious Business Name Statement filed with the county in which the Company is or was doing business.
14. Identify and explain any and all sales of the Company's assets if the sale represented a sale of substantially all of the Company's assets.

15. Identify and explain any investments by the Company in other businesses, companies, or corporations equating to 5% or more of that other business, company, or corporation from the formation of the Company to the present.
16. List the names, titles, telephone number(s), and current or last known addresses of all individuals who are currently or were officers and/or owners of the Company during any time that the Company was operating at any of the Facilities, regardless of the business structure under which the Company is or was operated. Provide documentation of both the percentage of each individual's current or former ownership interest in the Company, the time period(s) during which he/she held this ownership interest, and the name of the facility.
17. Identify the dates the Company, under any of its current or former business structures, owned the Penrose Facility, including, but not limited to the following Los Angeles County Assessor Parcels (APN): 1) APN 2311-002-001 (8271 Tujunga Ave.); 2) APN 2311-002-002 (also 8271 Tujunga Ave.); 3) APN 2314-001-001 (8216 Tujunga Ave.); and 4) APN 2314-001-002 (8175 Fair Ave.). Provide a copy of the title documentation evidencing the Company's ownership of the Penrose Facility, and provide the name and contact information for the sellers.
18. If the Company, under any of its current or former business structures, owned either the Hewitt Pit Facility or the Tuxford Facility, identify the dates of such ownership, provide a copy of the title documentation evidencing the Company's ownership, and provide the name and contact information for the sellers.
19. For any period of time in which the Company, under any of its current or former business structures, owned the Penrose Facility, provide the name, address, and phone number of each tenant or lessee, from the initial date of the Company's ownership until the present. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to any other operators at the Penrose Facility.
20. For any period of time in which the Company, under any of its current or former business structures, operated at, but did not own, any of the Facilities, provide the name, address, and phone number of that facility's owner. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to the real property owner during the Company's occupancy of the relevant facility.
21. Identify any individual or entity that owned or operated the Penrose Facility prior or subsequent to the Company. For each prior or subsequent owner or operator, further identify:
 - a. The dates of ownership/operation;
 - b. The nature of prior or subsequent operations at the Penrose Facility;
 - c. All evidence showing that the prior or subsequent owner or operator controlled access to the property; and

- d. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Penrose Facility during the period of prior or subsequent ownership or operation.
22. Identify any individual or entity that owned or operated the Hewitt Pit Facility prior or subsequent to the Company. For each prior or subsequent owner or operator, further identify:
- a. The dates of ownership/operation;
 - b. The nature of prior or subsequent operations at the Hewitt Pit Facility;
 - c. All evidence showing that the prior or subsequent owner or operator controlled access to the property; and
 - d. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Hewitt Pit Facility during the period of prior or subsequent ownership or operation.
23. Identify any individual or entity that owned or operated the Tuxford Facility prior or subsequent to the Company. For each prior or subsequent owner or operator, further identify:
- a. The dates of ownership/operation;
 - b. The nature of prior or subsequent operations at the Tuxford Facility;
 - c. All evidence showing that the prior or subsequent owner or operator controlled access to the property; and
 - d. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Tuxford Facility during the period of prior or subsequent ownership or operation.
24. Provide a complete list of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Penrose Facility during any or all of the period of time that the Company operated at or was otherwise associated with the Penrose Facility. For each employee listed, provide the following information:
- a. The employee's full name;
 - b. The employee's current or last known address and telephone number, including the last known date on which you believe each address and telephone number was current;
 - c. The dates that the employee worked at the Penrose Facility;
 - d. The position(s) the employee held under any of the Company's business structures; and
 - e. The employee's job title(s) and the corresponding dates during which the Company believes that the employee would have had knowledge of the use and disposal of wastes.
25. Provide a complete list of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Hewitt Pit Facility during any or all of the period of time that the Company operated at or was otherwise associated with the Hewitt Pit

Facility. For each employee listed, provide the following information:

- a. The employee's full name;
- b. The employee's current or last known address and telephone number, including the last known date on which you believe each address and telephone number was current;
- c. The dates that the employee worked at the Hewitt Pit Facility;
- d. The position(s) the employee held under any of the Company's business structures; and
- e. The employee's job title(s) and the corresponding dates during which the Company believes that the employee would have had knowledge of the use and disposal of wastes.

26. Provide a complete list of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Tuxford Facility during any or all of the period of time that the Company operated at or was otherwise associated with the Tuxford Facility. For each employee listed, provide the following information:

- a. The employee's full name;
- b. The employee's current or last known address and telephone number, including the last known date on which you believe each address and telephone number was current;
- c. The dates that the employee worked at the Tuxford Facility;
- d. The position(s) the employee held under any of the Company's business structures; and
- e. The employee's job title(s) and the corresponding dates during which the Company believes that the employee would have had knowledge of the use and disposal of wastes.

27. Provide an estimate of the approximate number of people employed by the Company at the Penrose facility, and the product(s) manufactured or services performed by the Company at this facility. Describe any significant change in the Penrose Facility size, the number of employees, or the products manufactured over time.

28. Provide an estimate of the approximate number of people employed by the Company at the Hewitt Pit Facility, and the product(s) manufactured or services performed by the Company at this facility. Describe any significant change in the Hewitt Pit Facility size, the number of employees, or the products manufactured over time.

29. Provide an estimate of the approximate number of people employed by the Company at the Tuxford Facility, and the product(s) manufactured or services performed by the Company at this facility. Describe any significant change in the Tuxford Facility size, the number of employees, or the products manufactured over time.

30. Provide a scaled map of the Penrose Facility which includes the locations of significant buildings and features. Indicate the locations of any maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Penrose Facility and identify the following:

- a. Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.)
 - b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);
 - c. Groundwater and dry wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);
 - d. Past and present stormwater drainage system and sanitary sewer system, including septic tank(s) and subsurface disposal field(s);
 - e. Any and all additions, demolitions or changes of any kind to physical structures on, under or about the Penrose Facility or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and
 - f. The location of all waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, and burn pits.
31. Provide a scaled map of the Hewitt Pit Facility which includes the locations of significant buildings and features. Indicate the locations of any maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Hewitt Pit Facility and identify the following:
- a. Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.)
 - b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);
 - c. Groundwater and dry wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);
 - d. Past and present stormwater drainage system and sanitary sewer system, including septic tank(s) and subsurface disposal field(s);
 - e. Any and all additions, demolitions or changes of any kind to physical structures on, under or about the Hewitt Pit Facility or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and
 - f. The location of all waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, and burn pits.
32. Provide a scaled map of the Tuxford Facility which includes the locations of significant buildings and features. Indicate the locations of any maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Tuxford Facility and identify the following:
- a. Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.)
 - b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);
 - c. Groundwater and dry wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);
 - d. Past and present stormwater drainage system and sanitary sewer system, including

- septic tank(s) and subsurface disposal field(s);
- e. Any and all additions, demolitions or changes of any kind to physical structures on, under or about the Tuxford Facility or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and
 - f. The location of all waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, and burn pits.
33. Provide copies of hazardous material business plans and chemical inventory forms (originals and updates) for each of the Facilities submitted to city, county, and state agencies.
 34. Provide a list of all chemicals and hazardous substances used at the Penrose Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets for all hazardous substances used.
 35. Provide a list of all chemicals and hazardous substances used at the Hewitt Pit Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets for all hazardous substances used.
 36. Provide a list of all chemicals and hazardous substances used at the Tuxford Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets for all hazardous substances used.
 37. Identify and provide the information below for all volatile organic compounds (most notably PCE; TCE; 1,1-DCE; MTBE; ,14-DCA, cis-1,2-DCE; and carbon tetrachloride); Title 22 metals including total and hexavalent chromium; 1,4-dioxane; N-nitrosodimethylamine (NDMA); perchlorate; which are or were used at, or transported to, the Penrose Facility:
 - a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product;
 - b. The location(s) where each chemical or hazardous substance is or was used, stored, and disposed of;
 - c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
 - d. The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and
 - e. The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances.
 38. Identify and provide the information below for all volatile organic compounds (most notably PCE; TCE; 1,1-DCE; MTBE; ,14-DCA, cis-1,2-DCE; and carbon tetrachloride); Title 22 metals including total and hexavalent chromium; 1,4-dioxane; N-

nitrosodimethylamine (NDMA); perchlorate; which are or were used at, or transported to, the Hewitt Pit Facility:

- a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product;
 - b. The location(s) where each chemical or hazardous substance is or was used, stored, and disposed of;
 - c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
 - d. The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and
 - e. The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances.
39. Identify and provide the information below for all volatile organic compounds (most notably PCE; TCE; 1,1-DCE; MTBE; 1,4-DCA, cis-1,2-DCE; and carbon tetrachloride); Title 22 metals including total and hexavalent chromium; 1,4-dioxane; N-nitrosodimethylamine (NDMA); perchlorate; which are or were used at, or transported to, the Tuxford Facility:
- a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product;
 - b. The location(s) where each chemical or hazardous substance is or was used, stored, and disposed of;
 - c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
 - d. The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and
 - e. The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances.
40. Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Penrose Facility, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, groundwater sampling, and air quality.
41. Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Hewitt Pit Facility, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface),

hydrogeology, groundwater sampling, and air quality.

42. Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Tuxford Facility, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, groundwater sampling, and air quality.
43. Identify, and provide the following information for, all groundwater wells that are located at the Penrose Facility:
 - a. A map with the specific locations of the Penrose Facility groundwater wells;
 - b. Date the Penrose Facility groundwater wells were last sampled;
 - c. List of all constituents which were analyzed during groundwater sampling events; and
 - d. All groundwater sampling results, reports of findings, and analytical data.
44. Identify, and provide the following information for, all groundwater wells that are located at the Hewitt Pit Facility:
 - a. A map with the specific locations of the Hewitt Pit Facility groundwater wells;
 - b. Date the Hewitt Pit Facility groundwater wells were last sampled;
 - c. List of all constituents which were analyzed during groundwater sampling events; and
 - d. All groundwater sampling results, reports of findings, and analytical data.
45. Identify, and provide the following information for, all groundwater wells that are located at the Tuxford Facility:
 - a. A map with the specific locations of the Tuxford Facility groundwater wells;
 - b. Date the Tuxford Facility groundwater wells were last sampled;
 - c. List of all constituents which were analyzed during groundwater sampling events; and
 - d. All groundwater sampling results, reports of findings, and analytical data.
46. Identify all insurance policies held by the Company from the time it commenced ownership of or operations at the Penrose Facility until the present. Provide the name and address of each insurer, the policy number, the amount of coverage and policy limits, the type of policy, and the expiration date of each policy. Include all comprehensive general liability policies and “first party” property insurance policies and all environmental impairment insurance. Provide a complete copy of each policy.
47. Identify all insurance policies held by the Company from the time it commenced ownership of or operations at the Hewitt Pit Facility until the present. Provide the name and address of each insurer, the policy number, the amount of coverage and policy limits, the type of policy, and the expiration date of each policy. Include all comprehensive general liability policies and “first party” property insurance policies and all environmental impairment insurance. Provide a complete copy of each policy.

48. Identify all insurance policies held by the Company from the time it commenced ownership of or operations at the Tuxford Facility until the present. Provide the name and address of each insurer, the policy number, the amount of coverage and policy limits, the type of policy, and the expiration date of each policy. Include all comprehensive general liability policies and “first party” property insurance policies and all environmental impairment insurance. Provide a complete copy of each policy.
49. For each of the Facilities, provide copies of any applications for permits or permits received under any local, state, or federal environmental laws and regulations, including any waste discharge permits, such as national pollutant discharge elimination system permits.
50. If the Company discharged any of its waste stream to the sewer at the Penrose Facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.
51. If the Company discharged any of its waste stream to the sewer at the Hewitt Pit Facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.
52. If the Company discharged any of its waste stream to the sewer at the Tuxford Facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.
53. For each waste stream generated at the Penrose Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.
54. For each waste stream generated at the Hewitt Pit Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.
55. For each waste stream generated at the Tuxford Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.
56. Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Penrose Facility prior to transport to a disposal site.
57. Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Hewitt Pit Facility prior to transport to a disposal site.
58. Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Tuxford Facility prior to transport to a disposal site.
59. Please describe the method used by the Company to remove waste streams from sumps at the Penrose Facility.

60. Please describe the method used by the Company to remove waste streams from sumps at the Hewitt Pit Facility.
61. Please describe the method used by the Company to remove waste streams from sumps at the Tuxford Facility.
62. Please identify all wastes that were stored at the Penrose Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.
63. Please identify all wastes that were stored at the Hewitt Pit Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.
64. Please identify all wastes that were stored at the Tuxford Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.
65. Please identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Penrose Facility. In addition, identify and provide supporting documentation of:
 - a. The date each release occurred;
 - b. The cause of each release;
 - c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
 - d. Where each release occurred and what areas were impacted by the release; and
 - e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.
66. Please identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Hewitt Pit Facility. In addition, identify and provide supporting documentation of:
 - a. The date each release occurred;
 - b. The cause of each release;
 - c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
 - d. Where each release occurred and what areas were impacted by the release; and
 - e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.
67. Please identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Tuxford Facility. In addition, identify and provide supporting documentation of:
 - a. The date each release occurred;
 - b. The cause of each release;

- c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
 - d. Where each release occurred and what areas were impacted by the release; and
 - e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.
68. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the Penrose Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.
69. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the Hewitt Pit Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.
70. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the Tuxford Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.
71. Documentation obtained by EPA indicates that Consolidated Rock Products Company ("Conrock") may have resumed ownership and/or operation of all or a portion of the Pensrose Facility in approximately 1978-1979, during or after its operation by the Company. Indicate whether Conrock owned and/or operated any portion of the Penrose Facility during or after the time it was operated by the Company. Provide an explanation as to why Conrock resumed ownership or operation of the Facility, if it did.
72. Documentation obtained by EPA indicates that as of 1984, the Company owned the Blue Diamond Pit, located near the Penrose Facility. Provide complete title documentation evidencing the Company's acquisition, transfer, and ownership of the real property at all addresses at which the Blue Diamond Pit operated. Indicate whether the Blue Diamond Pit was ever operated by the Company as a landfill. If so, provide a description of the landfill, including the addresses and parcel numbers comprising the landfill, indicate the types of wastes accepted at the landfill, and state the time frames of the Company's operation at each of the addresses comprising the landfill. To the best of your knowledge, also identify all other past or subsequent owners and operators of the Blue Diamond Pit, providing dates of ownership and operation.
73. Describe the corporate, business, or other affiliation between the Company and Los Angeles Steel Casting Company. Provide copies of all documents evidencing such affiliation(s), including, but not limited to, merger agreements, asset sale agreements, stock sale agreements, joint venture agreements, fictitious business name filings, and lease agreements.

74. Describe the corporate, business, or other affiliation between the Company and Consolidated Rock Products Company and its predecessors and successors. Provide copies of all documents evidencing such affiliation(s), including, but not limited to, merger agreements, asset sale agreements, stock sale agreements, joint venture agreements, fictitious business name filings, and lease agreements.